

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Chael Huselbee
The Glasshouse Nursery LLC

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Clemson University
and remaining

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 2:25-cv-4460-RMG-MGB

(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

2025 MAY 23 PM 12:05
CLERK OF DISTRICT COURT

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Chad Huselbee</u>
Street Address	<u>21618 Lowcountry Highway</u>
City and County	<u>Ruffin Colleton County</u>
State and Zip Code	<u>S.C. 29475</u>
Telephone Number	<u>864-437-0667</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Clemson university</u>
Job or Title (if known)	<u>organization</u>
Street Address	<u>105 Sikes Hall</u>
City and County	<u>Clemson Pickens County</u>
State and Zip Code	<u>S.C. 29634</u>
Telephone Number	<u>864-656-3311</u>

Defendant No. 2

Name	<u>Clemson Coastal Research and Education Center</u>
Job or Title (if known)	<u>organization</u>
Street Address	<u>2865 Savannah Highway</u>
City and County	<u>Charleston Charleston County</u>
State and Zip Code	<u>SC 29414</u>
Telephone Number	<u>843-573-0013</u>

Defendant No. 3

Name	<u>Office of Land and Capital Asset</u> <u>Stewardship</u> <u>Organization</u>
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Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

5 Research Drive
Greenville Greenville County
SC 29607
864-283-7100

Defendant No. 4

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

Laura H. Stoner
Associate VP Real Estate Strategy and operations
5 Research Drive
Greenville Greenville County
SC 29607
864-283-7107 and 704-813-0739

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

- False Claims Act 31 U.S.C. 3729-3733
- Destruction of Government Property 18 U.S.C. 1361
- 54 U.S.C. 320301
- 40 U.S.C. 550
- 54 U.S.C. 100101
- 40 U.S.C. 3306
- 26 U.S.C. 47
- 54 U.S.C. 3089
- 54 U.S.C. 3111

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	The Grasshouse Nursery LLC
Street Address	19642 Lowcountry Highway
City and County	Ruffin Colleton County
State and Zip Code	S.C. 29475
Telephone Number	864-437-0667

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	_____
Job or Title (if known)	_____
Street Address	_____
City and County	_____
State and Zip Code	_____
Telephone Number	_____

Defendant No. 2

Name	_____
Job or Title (if known)	_____
Street Address	_____
City and County	_____
State and Zip Code	_____
Telephone Number	_____

Defendant No. 3

Name	_____
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Basis for Federal Question Jurisdiction

This case arises under 28 U.S.C. § 1331 because it involves violations of federal statutes and constitutional provisions, including but not limited to:

- False Claims Act, 31 U.S.C. §§ 3729-3733
- Destruction of Government Property, 18 U.S.C. § 1361
- National Historic Preservation Act, 54 U.S.C. § 306101 et seq., including:
 - 54 U.S.C. § 320301 - Historic Sites, Buildings, Objects, and Antiquities
 - 54 U.S.C. § 100101 - National Park Service mission and preservation
 - 54 U.S.C. § 302902 - Historic preservation responsibilities of federal agencies
 - 54 U.S.C. § 3111 - Management of historic properties
 - 54 U.S.C. § 3089 - Administrative enforcement
- Federal Property and Administrative Services Act, 40 U.S.C. §§ 550, 3306
- Internal Revenue Code, 26 U.S.C. § 47 - Rehabilitation credit for historic buildings

These statutes involve federal protections of historically significant property, the improper use and destruction of federal resources, and violations that may involve false representations or failures of stewardship by state institutions utilizing federally acquired property.

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

See attachments

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See attachments

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See attachments

Short and Plain Statement of the Claim

1. In 2022, Plaintiff Chad A. Husselbee was told by Defendant Clemson University, through its representative Laura H. Stoner, that he could relocate a series of historic greenhouses from Clemson's property at 2875 Savannah Highway in Charleston, South Carolina, to his land in Ruffin, South Carolina, at his own expense.
2. Plaintiff followed all procedures outlined by Clemson, including meetings with their recommended contractor (DECO) and preparing the necessary equipment, land, labor, and financing to move the greenhouses. Clemson gave a removal deadline of Christmas 2022 and stated a 22-day window for the relocation.
3. Shortly before the move date, Clemson changed its decision and informed Plaintiff it would be keeping the greenhouses. This decision came after Plaintiff had invested substantial resources and built partnerships based on Clemson's previous commitments.
4. Plaintiffs Chad A. Husselbee and The Glasshouse Nursery LLC suffered financial losses, business setbacks, reputational harm, and long-term debt as a result of Clemson's reversal and refusal to allow the greenhouses to be moved.
5. The Defendant Laura H. Stoner was directly involved in communicating Clemson's assurances and provided the procedural steps Plaintiff followed. Her conduct directly contributed to the Plaintiffs' reliance and subsequent harm.
6. Plaintiff also relied on support from local, state, and federal contacts, including officials and agencies, who were aware of the planned project. The cancellation impacted Plaintiffs' work with nonprofit efforts and community programs.
7. Defendants' actions occurred primarily between 2020 and the end of 2022, with direct impact on the Plaintiffs in Charleston County and Colleton County, South Carolina.

Relief Requested

1. Plaintiffs request that the Court order Clemson University and its departments or representatives to cease any further alteration, development, or use of the greenhouse structures located at 2875 Savannah Highway, Charleston, South Carolina, until this matter is resolved.

2. Plaintiffs seek monetary damages in the amount of \$58,290,000, representing the following:

- Direct financial losses for equipment, trucks, trailers, land purchases, and loan obligations incurred in reliance on Clemson's permission to relocate the greenhouses.

- Loss of income and lost opportunities connected to time spent preparing for the project and the interruption of Plaintiffs' other business activities.

- Substantial corporate donations in the form of equipment and other resources were pledged to support the project and grow the business. These contributions were lost after Clemson revoked its approval, resulting in a major setback to the project's future potential and business development.

- Damage to personal and business reputation, including harm to relationships with government officials, nonprofit organizations, corporate partners, and members of the local community.

- The collapse of business plans centered around the relocation and rebuilding of the greenhouses for the benefit of local communities and schools.

3. Plaintiffs also request punitive damages in an amount to be determined at trial, based on what they believe was intentional, misleading, or reckless conduct by the Defendants after making specific promises and failing to follow through, despite Plaintiffs relying on those promises in good faith.

4. Plaintiffs believe the harm is ongoing because Clemson continues to retain the greenhouses after over a decade of deterioration and has reversed its position after Plaintiffs had already committed substantial resources to the relocation effort. These actions continue to impact Plaintiffs financially and professionally.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: May 23rd, 2025.

Signature of Plaintiff

Chad Husselbee

Printed Name of Plaintiff

Chad Husselbee

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Chad A. Husselbee and The Glasshouse Nursery LLC,
Plaintiffs,

v.

Clemson University, Clemson Coastal Research and Education Center,
Office of Land and Capital Asset Stewardship, and Laura H. Stoner,
Defendants.

COMPLAINT

1. This action arises under 28 U.S.C. § 1331 (Federal Question) and includes claims under the False Claims Act,
National Historic Preservation Act, Destruction of Government Property statutes, and related federal laws.
2. The Court has supplemental jurisdiction over related state law claims, including promissory estoppel, breach
of agreement, and unjust enrichment, pursuant to 28 U.S.C. § 1367 because they arise from the same nucleus
of operative fact as the federal claims.
3. Plaintiffs were assured by Clemson officials, including Laura H. Stoner, that they could relocate
greenhouse

structures to their property in Ruffin, SC, upon meeting specified requirements. All steps were completed.

4. Clemson reversed course just before the agreed deadline, keeping the structures and causing extensive financial,

reputational, and logistical harm to Plaintiffs who had reasonably relied on those promises.

5. Plaintiffs seek compensatory and punitive damages exceeding \$58 million, as well as declaratory and injunctive relief.

Respectfully submitted,

Chad A. Husselbee

21618 Lowcountry Highway

Ruffin, SC 29475

Phone: (864) 437-0667

Email: glasshousenurserysc@gmail.com

The Glasshouse Nursery LLC, By Chad A. Husselbee, Sole Member

Exhibit Index

Exhibit A: Original condition of greenhouse facility before Clemson assumed control

Exhibit B: Current condition of facility after over a decade of neglect by Clemson

Exhibit C: Plans and logistics for greenhouse relocation, including coordination with contractor

Exhibit D: Loan and expense documentation prepared in reliance on Clemson's authorization

Exhibit E: Letter from General Counsel (2024), confirming Clemson's communications

Exhibit F: Photographic timeline and visual proof of neglect and abandonment

Exhibit G: Public and private stakeholder support for relocation and redevelopment

Exhibit H: Clemson FOIA denial and communication trail

Exhibit I: November 20, 2024, letter sent to Clemson from Plaintiff

Exhibit J: FOIA request packet - Document 1

Exhibit K: FOIA request packet - Document 2